



MASCHKA, RIEDY, RIES & FRENTZ LAW FIRM

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April 11, 2024

Via e-mail only to ynp_dc@wyd.uscourts.gov

Honorable Stephanie A. Hambrick
U.S. Magistrate Judge
District of Wyoming

RE: DeBeer, Kimberly vs. Amazon Logistics Inc et al
Case No: 2:23-CV-00033-ABJ

FILED



4:24 pm, 4/11/24

Margaret Botkins
Clerk of Court

Dear Judge Hambrick:

I am writing to provide supplemental support for Plaintiff's Response in Opposition to the Amazon Defendants' Motion for Protective Order. (81). Attached to this letter is an Order from the Fourth Judicial District of the State of New Mexico entered recently denying Amazon's Motion for Protective Order on the identical issue of the depositions of Messrs. DasGupta, Coppinger and Hariharan. The *Ulibarri* Court considered the same arguments and proof submitted by Amazon in the instant case and denied Amazon's efforts to block these depositions in that matter. While not precedential on this Court's ruling on Amazon's Motion, Plaintiff asserts the *Ulibarri* Court's ruling is persuasive and further support to deny Amazon's Motion for Protective Order blocking Plaintiff from deposing these individuals who possess relevant information on the claims and defenses at issue in this matter.

Very truly yours,

MASCHKA, RIEDY, RIES & FRENTZ

Jed Chronic
jchronic@mrr-law.com

Enclosure

Gerald L. Maschka*■+ | Renee C. Rubish*+ | Nick A. Frentz*+ | George E. (Jed) Chronic▶▲
Nicholas J. Maxwell | Eric G. Iverson | Cody W. Booker◆▶ | Theman R. Taylor III

*Board Certified as Civil Trial Specialist by the National Board of Trial Advocacy and/or the Minnesota State Bar Association ▶Also admitted in Illinois
▲Also admitted in Florida & Missouri ◆Also admitted in Iowa ■Qualified ADR Neutral +Member of the American Board of Trial Advocates

FOURTH JUDICIAL DISTRICT
COUNTY OF SAN MIGUEL
STATE OF NEW MEXICO

FILED
4th JUDICIAL DISTRICT COURT
San Miguel County
4/9/2024 2:55 PM
CLERK OF THE COURT

JOSEPH M. ULIBARRI, JR., as Personal
Representative of THE ESTATE OF TRAVIS
RUIZ PIZARRO, Deceased,

Plaintiff,

v.

CAUSE NO. D-412-cv-2022-00032

KEECHI TRANSPORT LLC, AMAZON.COM, INC.,
AMAZON LOGISTICS INC., JIM SENA
CONSTRUCTION COMPANY INC., JIMMY BRITO,
NEW MEXICO DEPARTMENT OF TRANSPORTATION,
PAJARITO CREEK RANCH, LLC,
MICHAEL ROMERO, Individually, and STAR K
LOGISTICS, CORP.,

Defendants,

and

SCOTT ATKINSON, as Wrongful Death Personal Representative
of the ESTATE OF JORGE MARTINEZ-SANCHEZ, Deceased,
and LISET ARMENTERO,

Plaintiff-In-Intervention,

v.

JIMMY BRITO; JIM SENA CONSTRUCTION COMPANY, INC.,
and NEW MEXICO DEPARTMENT OF TRANSPORTATION,

Defendants,

and

MICHAEL ROMERO; and PAJARITO CREEK RANCH, LLC,

Defendants-In-Intervention.

and

JIMMY BRITO,

Third-Party Plaintiff,

v.

AMERICAN NATIONAL PROPERTY & CASUALTY
INSURANCE COMPANY,

Third-Party Defendant.

**ORDER ON DEFENDANT AMAZON'S MOTIONS FOR PROTECTIVE ORDER
AND TO QUASH**

On this day came on to be heard the Amazon Defendants' Motion for Protective Order to Quash Subpoena Issued to Steve Dasgupta and Motion for Protective Order and Motion to Quash Subpoenas Issued to Mahendran Hariharan and Brian Coppinger. The Court after reviewing briefing and evidence and listening to argument denies both motions for protective order and orders amazon to produce Dasgupta and Coppinger. As to Hariharan, the Court is issuing a commission to take out of state deposition, however if the amazon Defendants so choose, they may produce him without the need for a subpoena. As to the documents requested in the notices, the parties will try to agree to a scope and if no scope is agreed within 10 days, the Court will convene a second emergency hearing to resolve the issue.

SIGNED this _____ day of _____, 2024.



04/03/2024

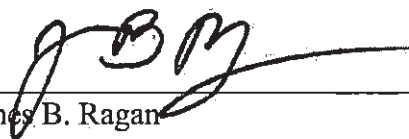
FLORA GALLEGOS,
JUDGE PRESIDING

Order submitted by:

/s/ Gilbert Arrazolo
Gilbert Arrazolo

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and



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*Attorneys for Plaintiff Joseph M. Ulibarri, Jr.,
as Personal Representative of the Estate of Travis
Ruiz Pizarro, Deceased*
Order approved electronically by:

/s/ Gregory D. Steinman

Gregory D. Steinman
*Attorneys for Defendant Pajarito Creek
Ranch, LLC and Michael Romero*

/s/ Daniel O'Brien

Daniel O'Brien
Attorney for Defendant Keechi Transport, LLC

/s/ Jeramy I. Schmehl

Jeramy I. Schmehl
*Attorney for Defendant Amazon,com and
Amazon Logistics, Inc.*

/s/ Gregory A. Payne

Gregory A. Payne
Attorney for Defendant Jim Serna Construction Co.

/s/ Robert M. Ortiz
Robert M. Ortiz
Attorney for Intervenor Scott Atkinson

/s/ Chad D. Willis
Chad D. Willis
Attorney for Defendant Star K. Logistics

/s/ Michael P. Jasso
Attorney for Defendant/Third-Party
Plaintiff Jim Brito

/s/ Jennifer M. Meyer
Attorney for Third Party-Defendant American
National Property & Casualty Insurance Company,

/s/ Seth C. McMillan
Attorney for New Mexico Department of
Transportation